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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Kirk J. Petrulli, : Bankruptcy Case No.: 17-21336-CMB

:

Debtor. : Chapter 13

Kirk J. Petrulli,

: Document No.:

Movant, :

Related to Document No.:

v. :

Wilmington Savings Fund Society, : FSB, d/b/a Christiana Trust, not, : Individually but as trustee for, Pretium Mortgage Acquisition, :

Trust,

Related to Claim No.: 3

## **DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on December 24, 2019, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the Plan even with the proposed change for February 1, 2020.

The new post-petition monthly payment payable to Respondent is \$447.47, effective February 1, 2020, per the notice dated December 24, 2019. The Debtor's Plan payment provides for a monthly payment to Wilmington Savings Fund Society, FSB of \$491.31. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: December 27, 2019 /s/Brian C. Thompson

Brian C. Thompson, Esquire

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